

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
as representative of : Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO, *et al.*, : (Jointly Administered)
Debtors.¹ :
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**INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL DEBT
COALITION REGARDING ITS REQUEST TO BE HEARD
AT THE OCTOBER 28-29, 2020 HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)² submits this informative motion in response to the Court’s *Order Regarding Procedures for October 28-29, 2020 Omnibus Hearing* (ECF No. 14619) (the “Order”), and respectfully states as follows:

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² See Eighth Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019 (ECF No. 14316).

1. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, will appear telephonically on behalf of the LCDC at the October 28-29, 2020 Omnibus Hearing to address, as necessary, the following matters:

- a. *Joint Motion of PSA Creditors pursuant to Sections 312 of the PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for Plan of Adjustment* [ECF No. 14478] (the “PSA Creditors’ Motion”);
- b. *Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing an Independent Investigation* [ECF No. 14450] (the “National Motion”);
- c. *Official Committee of Unsecured Creditors’ Limited Joinder in Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing an Independent Investigation* [ECF No. 14527] (the “Committee Joinder”);
- d. *Objection of the Lawful Constitutional Debt Coalition to the Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing an Independent Investigation* [Exhibit to ECF No. 14567] (the “LCDC Objection”);
- e. Any objections, responses, statements, joinders and replies filed in respect of the PSA Creditors’ Motion, National Motion, Committee Joinder, or the LCDC Objection.

2. In connection with the National Motion, Andrew Ceresney of Debevoise & Plimpton LLP, counsel for GoldenTree Asset Management LP (“GTAM”), a member of the LCDC, and Lee Richards or Daniel Zinman of Richards Kibbe & Orbe LLP, counsel for Whitebox Advisors LLC (“Whitebox”), a member of the LCDC, will be available to respond to any questions the Court may have regarding GTAM’s or Whitebox’s security trades and compliance with securities laws.

3. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or

any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the LCDC.

WHEREFORE, the LCDC respectfully requests that the Court take notice of the above.

DATED: October 22, 2020
San Juan, Puerto Rico

Respectfully submitted,

REICHARD & ESCALERA

By : /s/ Rafael Escalera
Rafael Escalera
USDC No. 122609
escalera@reichardescalera.com

Sylvia M. Arizmendi
USDC-PR 210714
arizmendis@reichardescalera.com

Carlos R. Rivera-Ortiz
USDC-PR 303409
riverac@reichardescalera.com

255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, Puerto Rico 00917-1913

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Susheel Kirpalani (*pro hac vice*)
susheekirpalani@quinnemanuel.com

Daniel Salinas
USDC-PR 224006
danielsalinas@quinnemanuel.com

Eric Kay (*pro hac vice*)
erickay@quinnemanuel.com

Kate Scherling (*pro hac vice*)
katescherling@quinnemanuel.com

Zachary Russell (*pro hac vice*)
zacharyrussell@quinnemanuel.com

51 Madison Avenue, 22nd Floor
New York, New York 10010-1603

Co-Counsel for the Lawful Constitutional Debt Coalition

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409